



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 9, 2020

BY ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
Daniel Patrick Moynihan U.S. Courthouse
New York, New York 10007

Re: United States v. Stefan Gillier, 11 Cr. 409 (RMB)

Dear Judge Berman:

A status conference is currently scheduled in the above-captioned case for Monday, November 16, 2020 at 11:30 a.m. The parties jointly and respectfully submit this letter to update the Court and to request an approximately two-month adjournment of this status conference, if acceptable to the Court. By way of update, the Government has recently made several additional productions of discovery, totaling several thousand pages (e.g., emails, bank records, government reports, business records, etc.). Since the last conference in September, the defense has reviewed and analyzed discovery, as well as shipped printed versions of previously produced discovery to the defendant. Discovery remains ongoing, though the Government has produced the majority of Rule 16 material. In light of these updates, the parties respectfully request an approximately two-month adjournment of the upcoming status conference; we anticipate being in a better position to address next steps in the case at that time. The Government also requests that the Court exclude time, pursuant to the Speedy Trial Act, between November 16, 2020 and the date of the next conference, for the continued production and review of discovery, and so that the parties can engage in negotiations about a potential pretrial resolution, if appropriate. The defense consents to this request. Of course, if preferable for the Court, the parties will appear as currently scheduled.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney
Southern District of New York

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Adjournment granted to 2/22/2021 at
10:30 am. Time is excluded pursuant to
the Speedy Trial Act for the reasons set
forth in this letter.

SO ORDERED:
Date: 11/9/2020

Richard M. Berman
Richard M. Berman, U.S.D.J.